

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

THERESA J. FULLERTON	:	Bankruptcy No. 18-10948 JCM
	:	
Debtor	:	
	:	
_____	:	
	:	Chapter 13
THERESA J. FULERTON	:	
	:	
Movant	:	
v.	:	
	:	
U.S. Bank Trust National Association	:	
Selene Finance LP	:	
	:	
Respondent	:	
	:	
RONDA J. WINNECOUR, Esq. Trustee:	:	
	:	
Respondent	:	
_____	:	

**RESPONSE TO MOTION FOR ACCOUNTING AND FOR
TURNOVER OF PROPERTY**

AND NOW, comes Movant, Selene Finance LP as servicing agent for U.S. BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR RCF 2 ACQUISITION TRUST, (hereinafter "Creditor") by and through its undersigned counsel, Robertson, Anschutz, Schneid, Crane & Partners, PLLC, and in Response to the Motion for Accounting and for Turnover of Property (the "Motion") (DE#129), represents as follows:

1. Debtor, Theresa J. Fulerton ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on September 18, 2018.
2. Secured Creditor holds an interest in Debtor's real property located at 6348 W Lake Rd Erie, PA 16505.
3. Secured Creditor filed its Proof of Claim, on October 18, 2018 as Claim Number 6-1. Amended Proof of Claims filed June 30, 2023 and July 18, 2023.

4. On May 19, 2025, Trustee filed an Motion for Turnover of Property.
5. Secured Creditor is in the process of reviewing their records.
6. However, it is believed by Creditor that funds were received following the satisfaction of the mortgage loan.
7. It is the intention of the Secured Creditor to fully cooperate with getting this situation resolved as quickly as possible.
8. Once it has been determined exactly how much was received following the satisfaction of the mortgage loan, those funds will be immediately remitted to the Chapter 13 Trustee.

WHEREFORE, Secured Creditor requests this Honorable Court allow Secured Creditor time to review its records and determine the amounts received after the satisfaction for turnover to the Trustee.

Date: June 5, 2025

/s/ Robert Shearer

Robert Shearer
Robertson, Anschutz, Schneid, Crane &
Partners, PLLC
Authorized Agent for Secured Creditor
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 5, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Theresa J. Fullerton

2078 Route 97
Waterford, PA 16441

Timothy William Long

6348 W LAKE RD
Erie, PA 16505

Tina E. Dunar

6348 W LAKE RD
Erie, PA 16505

Tammy S. Totleban

6348 W LAKE RD
Erie, PA 16505

Jeffrey G. Herman

114 High Street PO Box 455
Waterford, PA 16441

Ronda J. Winnecour , *Trustee*

Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee

1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222

/s/ Robert Shearer

Robert Shearer
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